

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, ex rel. W.A. DREW
EDMONDSON, in his capacity as ATTORNEY GENERAL
OF THE STATE OF OKLAHOMA and OKLAHOMA
SECRETARY OF THE ENVIRONMENT C. MILES TOLBERT,
in his capacity as the TRUSTEE FOR NATURAL
RESOURCES FOR THE STATE OF OKLAHOMA,

Plaintiffs,

v.

TYSON FOODS, INC.; TYSON POULTRY, INC.; TYSON
CHICKEN, INC.; COBB-VANTRESS, INC.; AVIAGEN, INC.;
CAL-MAINE FOODS, INC.; CAL-MAINE FARMS, INC.;
CARGILL, INC.; CARGILL TURKEY PRODUCTION, LLC;
GEORGE'S, INC.; GEORGE'S FARMS, INC.; PETERSON
FARMS, INC.; SIMMONS FOODS, INC.; and WILLOW
BROOK FOODS, INC.,

Defendants.

Case No. 05-CV-0329 JOE-SAJ

**DEFENDANT, CARGILL TURKEY PRODUCTION, LLC AND CARGILL, INC.'S
MOTION TO ADOPT AND JOIN IN REPLIES FILED BY OTHER DEFENDANTS**

COME NOW the Defendants, Cargill Turkey Production, LLC and Cargill, Inc. and hereby adopt and join in the following Replies filed by other Defendants and incorporate by reference all statements, arguments and points of authority contained therein:

1. Reply To Plaintiffs' Response In Opposition To Peterson Farms, Inc.'s Alternative Motion To Stay Proceedings Pending Appropriate Regulatory Agency Action, and Brief In Support;

2. Reply To Plaintiffs' Response In Opposition To Peterson Farms, Inc.'s Motion To Dismiss, and Brief In Support;

3. Reply to Plaintiffs' Response To Tyson Foods, Inc., Tyson Poultry, Inc., Tyson Chicken, Inc. and Cobb-Vantress, Inc.'s Motion For More Definite Statement With Respect To Counts One And Two Of The First Amended Complaint;

4. Tyson Poultry, Inc.'s Reply In Support Of Its Motion to Dismiss Count 3 Of Plaintiffs' First Amended Complaint;

5. Reply Memorandum Of Tyson Foods, Inc. In Support Of Its Motion To Dismiss Counts 4-10 Of The First Amended Complaint; and

6. Cobb-Vantress, Inc.'s Reply In Support Of Motion To Dismiss Counts, Four, Six, Seven, Eight, Nine And Ten Of The First Amended Complaint or Alternatively, Stay The Action.

Respectfully submitted,

RHODES, HIERONYMUS, JONES, TUCKER & GABLE, PLLC

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ATTORNEYS FOR DEFENDANTS, CARGILL, INC. AND
CARGILL TURKEY PRODUCTION, LLC

CERTIFICATE OF SERVICE

I certify that on the 6th day of December, 2005, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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I also hereby certify that I served the attached document by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

Elizabeth C. Ward
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and

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and

C. Miles Tolbert
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s/ John H. Tucker